

Exhibit O

Kim King-Macon - December 9, 2022

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IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

TAIWAN DICKERSON and KIM
KING-MACON, Each Individually and on
Behalf of All Other Similarly Situated, PLAINTIFFS

CASE NO. 4:22-cv-00519-HEA

CENTENE MANAGEMENT COMPANY,
LLC, and CENTENE CORPORATION, DEFENDANTS

DEPOSITION OF KIM KING-MACON

DECEMBER 9, 2022

11:00 A.M.

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1 Q Do you have any changes to these responses?

2 A I do not have any changes in those responses.

3 Q Thank you. How did you learn about the job with Centene?

4 A I put in an application online.

5 Q And how did you hear about the opportunity?

6 A My old job, with Forever Care, told us about it because
7 they were going out of business.

8 Q And why did you apply?

9 A I applied because I needed a job. My job was being
10 discontinued.

11 Q Okay. Did you receive an offer letter?

12 A I did.

13 Q All right. I'm going to introduce the next exhibit. This
14 is going to be Exhibit 19.

15 DEFENDANT'S EXHIBIT #19 ENTERED

16 BY MS. STORCH

17 Q Okay. I'm going to share my screen. All right. Does
18 this look familiar? This is Exhibit 19 I'm introducing. I'll
19 scroll through. Is this a correct copy of the offer letter you
20 received?

21 A I really -- that has been so long ago, it may be the
22 letter. I really can't tell you because that has been a while
23 back. It may have been the letter that I got. I don't know.

24 Q All right. Did you accept the terms of the letter?

25 A I did accept the terms of the letter. Yes, I did.

Page 16

1 Q And on this page right here, I'm going to highlight, it
2 says you agree -- oops, it's highlighting more than I would like
3 it to -- it says you'll agree you'll abide by all policies,
4 practices and procedures of Centene which are subject to change
5 at any time in the sole discretion of Centene. Did you agree
6 that you would abide by all the policies of Centene?

7 A I did.

8 Q All right. And you did comply with -- did you comply with
9 all the policies of Centene during your employment?

10 A I did comply with some, yes.

11 Q Okay. Which ones did you not comply with?

12 A And you're speaking specifically about which ones?

13 Q That's what I'm asking you. You said you didn't comply
14 with all of the policies. Which ones did you not comply with?

15 A I mean, I did work some overtime.

16 Q Say that one more time. I'm sorry.

17 A I worked overtime.

18 Q You worked overtime?

19 A I did.

20 Q And you said that was not complying with the policy?

21 A That was not in compliance with their policy.

22 Q Okay. Why was that?

23 A In order for me to effectively do my job, I had no choice.

24 Q Okay. What policy are you talking about that was not in
25 compliance with?

1 Q Well it says terminated July 24th.

2 A Okay.

3 Q It says hired March 11th. Do you have any reason to doubt
4 that that would be accurate?

5 A I mean, it may be accurate. I can't say that. I don't
6 know. I mean --

7 Q Okay. And during your employment, did you receive
8 policies regarding proper time-keeping and off-the-clock work?

9 A I don't remember. I don't remember getting a proper time-
10 keeping.

11 Q Okay. I'm going to introduce Exhibit 5. Did you receive
12 a copy of the Employee Handbook for Centene?

13 A I did.

14 Q Okay. This is Exhibit 5, and you had access to this
15 handbook; correct?

16 A I think it was in my desk. Yes.

17 DEFENDANT'S EXHIBIT #5 ENTERED

18 BY MS. STORCH

19 Q Okay. All right. On Page 5, of this document, it says
20 employees are expected to know and abide by the Centene
21 policies outlined in this handbook and on CNET. Do you see
22 that at the bottom of the last paragraph?

23 A Yes.

24 Q Okay. Did you have access to the company's intranet on
25 CNET?

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1 A Yes.

2 Q And on Page 15, of this document, maybe -- okay. Do you
3 see on this page, at the very top, employees who are classified
4 as non-exempt must accurately record the time they work each
5 day, including arrival, departure, and meal-break times?

6 A Yes.

7 Q Okay. The policies require you to accurately record all
8 of your time; correct?

9 A Yes.

10 Q Okay. And you recorded your time that you worked
11 accurately; is that correct?

12 A I did.

13 Q Okay. I'm going to go to the next policy and -- oops,
14 sorry about that -- okay. Then it says, further in this
15 policy, is a violation of company's policy for anyone to
16 instruct or encourage another employee to work off-the-clock or
17 to incorrectly report hours worked or to alter another
18 employee's time records. If an employee is directed or
19 encouraged to incorrectly report hours worked or to alter
20 another employee's time records, they should report the
21 incident immediately to a supervisor or local HR business
22 partner. Do you see that?

23 A Yes.

24 Q Do you understand the policy of prohibiting off-the-clock
25 work?

Page 23

1 A I understood the policy, yes.

2 Q Okay. Did you ever report off-the-clock work or
3 alteration of time records?

4 A I never altered anything. I just didn't report it. I
5 just worked it and did not report it because I knew I would be
6 in trouble.

7 Q Okay. Did you ever report off-the-clock work, work that
8 wasn't recorded?

9 A There was no need to report it because they would have --
10 they stated that they did not want us to work off-the-clock.
11 They didn't want us to work after 5:00.

12 Q They said they didn't want you to work off-the-clock?

13 A They didn't want us to work after 5:00.

14 Q Okay. Did you ever report that you had worked after 5:00?

15 A No.

16 Q Okay. And this part of the policy says when non-exempt
17 employees receive their paychecks, they should verify
18 immediately their working time was recorded accurately and they
19 were paid correctly for all hours worked. Discrepancies should
20 be reported to payroll immediately. Did you understand that
21 policy?

22 A I did but I also understood Lauren.

23 Q And when you said you understood Lauren, what do you mean?

24 A There is to be no work after 5:00, under any
25 circumstances.

1 said to me in the email.

2 Q Did you ever say anything to Lauren?

3 A There wasn't a need to say anything to her. We had visits
4 in the office and our business did not go well.

5 Q Your visits did not go what?

6 A Well.

7 Q Why is that?

8 A We had two visits in our office. Her understanding was
9 zero.

10 Q Her understanding was zero?

11 A Yes.

12 Q About what?

13 A The time, after 5:00, the amount of members we had. I had
14 two visits with her on that and it didn't -- I mean, she didn't
15 have an understanding on that. She felt like in the time that
16 we had at work, we should have been able to deal with it.

17 Q So she felt like you could have completed your work, with
18 the number of members you had, between 8:00 and 5:00?

19 A We didn't have enough employees there so we had to take on
20 a different load, for her understanding, more of a load.

21 Q And Lauren's understanding, it's your testimony, that she
22 believed that you could complete the work you were assigned in
23 the 8:00 to 5:00 range?

24 A Correct.

25 Q Okay. So you understood the time-keeping policies and the

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1 policy saying you needed to accurately record your time and
2 that you shouldn't work off-the-clock, etcetera; correct?

3 A I did understand it. Yes.

4 Q Okay. And you also received training about time-keeping;
5 correct?

6 A I don't know so much as time-keeping. I received training
7 on my job.

8 Q Okay. I'm going to pull up the HRIS file, the one that
9 showed your dates of employment, and I will show you this is a
10 record of your training in this file. It's moving kind of fast
11 but I'll get to it in just a sec. All right. So on April
12 11th, it says --

13 MS. MARTELL: Natalie, I'm not sure
14 the document is being shared.

15 MS. STORCH: Oh, it's not being
16 shared. Thank you. I'm sharing it in my
17 head but I haven't shared it with you. I'm
18 looking. I apologize.

19 BY MS. STORCH

20 Q All right. So can you see that now?

21 A I don't know what this is that keeps popping up on my
22 screen. I'm sorry, go ahead.

23 Q Can you see the HRIS file?

24 A Yes.

25 Q Okay. Can you see that there -- I'm going to highlight it

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1 monthly --

2 A I would assume that it's TruCare. I don't remember the
3 name of the system. I can't tell you.

4 Q But you logged everything?

5 A Yes. Everything had to be logged.

6 Q And what did you talk about in the month contact?

7 A How that patient -- that member was doing. Either you
8 spoke with the member, if that member was capable of speaking
9 you, or you spoke with a guardian.

10 Q And how long did that contact call take?

11 A Most of the time it was already set up. The initial call,
12 you would just make a call and go do a visit. Either it was a
13 visit or a call, depending on what that member wanted to do.
14 Some of them wanted to see you, others wanted to call.

15 Q So your monthly contact could have been in person?

16 A Some were in person. Some were just I called.

17 Q Okay. And when you were making the notes in the system,
18 TruCare or whatever it was called, you made that at the same
19 time as you did the contact, whether it was in person or over
20 the phone, while you were doing it?

21 A If it was over the phone, you did it after. If you did it
22 in person, you did after as well. That had to be done at some
23 point either after you did it or when you were able to -- it
24 was supposed to have been done right after, but either after --
25 like if you were on the road. Most of my visits were in the

1 through, what else can you do?

2 Q Okay. Did you ever make any complaint, specifically,
3 about pay?

4 A Mr. Elliott and I talked about it.

5 Q What did you talk about?

6 A He told me there was no need for us to try to work over
7 because we could not. It was set in stone, we could not.

8 Q Okay. So he said you couldn't work past 5:00?

9 A We needed not to work past 5:00.

10 Q Okay. Did you ever have any -- so you were talking about
11 your work hours with Mr. Elliott, did you ever complain to
12 anyone about pay?

13 A No. My pay was fine. I had no problem about my pay.

14 Q And so you said you talked about Mr. Elliott -- talked
15 with Mr. Elliott about he said you couldn't work past 5:00;
16 correct?

17 A That is correct.

18 Q But he didn't ever tell you you have to work past 5:00,
19 but clock-out at 5:00; correct?

20 A No. He never gave me permission to do that.

21 Q Okay. When you were hired by Centene, you worked from
22 8:00 to 5:00 p.m., you've testified; correct?

23 A Correct.

24 Q Did you go to the office in the morning generally?

25 A I went to the office all day when I began in the

1 Q What was the most you had to drive to a member?

2 A Forty, maybe fifty or more miles. Maybe more sometimes.

3 It just depends on where exactly it was because like I said, it
4 was in Jefferson County. Sometimes -- I can't remember exactly
5 what the name of the city was.

6 Q Okay. And you talked about a meeting with Lauren and you
7 can't remember her last name, where she was telling you that
8 you couldn't work past 5:00; correct?

9 A That was one of the meetings. Yes.

10 Q Okay. Who else was at that meeting when that was talked
11 about?

12 A Just she and I.

13 Q No other Care Coordinators?

14 A No.

15 Q Okay. And did you have team meetings with your team?

16 A Yes.

17 Q Were those required?

18 A Yes.

19 Q And when you and Lauren had the meeting about not working
20 past 5:00, she didn't tell you to clock-out at 5:00 and
21 continue working; correct?

22 A No. She didn't.

23 Q Okay. Is it your claim that you were never paid overtime?

24 A No. That's not my claim. I may have gotten paid for
25 maybe five to seven minutes overtime. It was never the doable

1 amount of time I worked over.

2 Q Okay. But if you weren't clocked-in when you said you're
3 working after 5:00, if you'd already clocked-out, nobody knew
4 you were working that time; correct?

5 A After I -- no, they didn't. You could say no.

6 Q Okay. Let's see. And we talked about the notes, at the
7 beginning of the deposition, when I asked you if you'd reviewed
8 anything to prepare, so you said you did look at your notes
9 when you prepared for the deposition, so those are the notes
10 that I was talking about before. I went back and looked at my
11 notes. So you said you looked at notes that you had made to
12 prepare for the deposition. Do you remember that?

13 A I looked at some notes that I jotted down early on.

14 Q Early on, okay. Those are the notes that I'm talking
15 about. Did you provide those to your attorney?

16 A Those are notes that I jotted down that he and I -- after
17 he and I talked in the very beginning.

18 Q In the very beginning of the case?

19 A Yes. There's nothing that I gave him.

20 Q Okay. You said sometimes you came back from your member
21 visits to the office. Sometimes you didn't. What time would
22 you get back to the office if you did return to the office?

23 A I have no clue what time that would have been. It just
24 would have been dependent upon the time that I finished my
25 visits.

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1 they did any personal items, activities?

2 A No. I don't.

3 Q Okay. I'm going to show your pay-stubs. You might need
4 your glasses for this exhibit. The print is really small. I
5 might need two pairs of glasses for this exhibit. Okay.

6 A Oh Christ.

7 Q Oh, it's not going to be that small. There it is. That's
8 a little bit bigger. Okay. I'm going to scroll through.
9 These are your pay-stubs from when you worked at Centene. This
10 is Exhibit 22. I'm introducing Exhibit 22. I'm going to
11 scroll through. If you'd like me to slow down, let me know.

12 A Can you slow down, yes.

13 Q I'm a fast scroller.

14 DEFENDANT'S EXHIBIT #22 ENTERED

15 BY MS. STORCH

16 Q Do these pay-stubs look like an accurate statement of what
17 was paid to you when you were working for Centene?

18 A I assume so. I don't remember all of that so I assume. I
19 don't know. That's a guess.

20 Q Is it an accurate statement of the hours you worked?

21 A Those are the accurate hours that I was paid.

22 Q You were paid. Is it an accurate statement of the hours
23 you reported you worked?

24 A Yes.

25 Q Okay. When you received a paycheck and a pay-stub, did

1 DEFENDANT'S EXHIBIT #23 ENTERED

2 BY MS. STORCH

3 Q Okay. Do you see Exhibit 23 on the screen, Ms. King-
4 Macon? These are your time records.

5 A Okay.

6 Q You see it's got at the very top the punch-in and punch-
7 out time.

8 A Okay.

9 Q Is there any reason to believe that these are not
10 accurate, the punch-in and punch-out time?

11 A No. I don't guess so.

12 Q Okay. Are you alleging that anyone ever changed your
13 time?

14 A Oh, no, no, no.

15 Q Okay. And you said that you were working when you were
16 not clocked-in. How would any supervisor ever know you were
17 working when you weren't clocked-in?

18 A They wouldn't.

19 Q Okay. So you never complained to anyone that you weren't
20 paid because you were working when you weren't clocked-in?

21 A I asked how were we supposed to complete our work in that
22 time and was told that was the only time we could work, and
23 there was no need to tell anyone if you're told that.

24 Q Okay. And if you forgot to clock-in or forgot to clock-
25 out, you were able to edit your time; correct?

1 A They edited it for us.

2 Q Okay. But you could also edit your own time; correct?

3 A Not with -- I don't think so. No. They would have to
4 edit it.

5 Q Okay. So if you missed a punch or something, if you
6 forgot to clock-out for lunch, how would you address that?

7 A You would let the supervisor know, if I'm not mistaken,
8 and they would have to go in and change it.

9 Q Okay. So whatever edits are made to time, based on
10 whatever, a Care Coordinator would bring to the attention of
11 their supervisor, that would be very individual based on the
12 Care Coordinator; correct?

13 A Could you repeat that again, please.

14 Q So if there are any edits made to time, that would be
15 individualized based on the Care Coordinator; correct? If they
16 needed edits to their time, that would be something that
17 wouldn't apply to everyone, it would just apply, situationally,
18 if you missed lunch or if another Care Coordinator missed lunch
19 or forgot to punch-in or punch-out, that would be specific to
20 that Care Coordinator. It wasn't across the board for time
21 changes, like changing your time?

22 A Well the time would have -- I don't think we could change
23 our time. I think that was something that the supervisors
24 would have to do.

25 Q Okay. So each person's supervisor would change the folks

1 in their team. They would be responsible for that?

2 A Yes.

3 Q It wasn't -- okay, got it. And you said that you were not
4 paid for the hours that you worked after 5:00, but nobody knew
5 about it, but they said that the hours that you could work were
6 8:00 to 5:00, and you said that Ms. Lauren communicated that to
7 you in a one-on-one meeting. Was there anyone else who
8 communicated that to you ever?

9 A As I stated, again, I spoke with Mr. Elliott about it as
10 well.

11 Q Okay. Was that in a meeting or a one-on-one?

12 A Just a conversation we had one-on-one.

13 Q Okay. Was there anyone else who communicated that to you?

14 A No.

15 Q Okay. And was there any other circumstance, other than
16 those two one-on-one meetings with Mr. Elliott and Ms. Lauren,
17 where they said you only can work from 8:00 to 5:00?

18 A No.

19 Q Okay. And other than the communication with the
20 receptionist where you weren't able to speak to the person you
21 wanted to speak to, making a general complaint that you wanted
22 to talk about some things, did you ever complain to anyone else
23 about your work or pay or hours?

24 A Not my pay but my hours. No.

25 Q Okay. Not anyone else besides the one complaint that you

1 said they said they couldn't help you; correct?

2 A Correct.

3 Q Did you ever complain to HR, Human Resources?

4 A I don't think so. No.

5 Q Okay. So if you actually clocked-out after 5:00 -- you
6 said there were some times where you clocked-out after 5:00,
7 you were paid for all of that time; correct, if you actually
8 clocked-out --

9 A I was.

10 Q Okay. I'm going to show you Exhibit 23. It's the time
11 report that we just talked about. I'll show you that again,
12 and I have -- it's another tab. I just copied this information
13 over to the highlighted tab, and I highlighted in yellow the
14 times that you clocked-in before 8:00, slightly, and then the
15 times you clocked-out after 5:00. Do you see all of those?

16 A Yes.

17 Q Okay. And there's one at 6:07, do you see that?

18 A I remember that day.

19 Q 6:00, 5:41, 5:26 was another one, 5:45, 6:52, 5:54. So
20 all the times that were, you know, more than a couple of
21 minutes after 5:00, you were paid for all those if you clocked-
22 out after 5:00; correct?

23 A Yes.

24 Q Okay. I'm going to show your pay-stubs again which is

25 Exhibit 22. This is the first page and I'm going to go through

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1 and I'm gonna just represent to you that there's several
2 instances where you actually were paid overtime, I think on
3 five instances. So overtime is paid in this pay-period in
4 July, 2.17 hours. Do you see that?

5 A Uh-huh.

6 Q Okay. And, here, .61 hours. Do you see that?

7 A Uh-huh.

8 Q 1.18 hours in the pay-period in April. .78 hours in May.
9 Do you see that?

10 A Yes, ma'am.

11 Q Okay. And also in May, again, .51 hours, 2.17 hours, do
12 you see that one, July?

13 A Yes.

14 Q Okay. I think that's the duplicate pay-stub for that one,
15 for 2.17. It is. So you would agree that you were paid some
16 overtime when you worked for Centene; correct?

17 A Yes. I stated that.

18 Q Okay.

19 A Those were hours when I was out in the field and with a
20 member.

21 Q Okay. So besides the overtime that you were actually paid
22 on your paychecks, how much more overtime are you saying that
23 you worked in a week?

24 A Out in the field, like I was in Pine Bluff -- in the Pine
25 Bluff area with a member, that's fine, but once I left that

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1 member's house, on my way home, putting in those notes, I had
2 to put that in on my time. That extra time was not added in.

3 Q Driving home?

4 A The driving home was the mileage, but putting in the notes
5 was not added in.

6 Q You're not claiming you weren't paid for mileage; correct?

7 A No. I didn't say that. No.

8 Q So you were paid for all your mileage?

9 A Yes.

10 Q Okay. It's just the notes when you got home?

11 A Right. Because I had already worked overtime. That was
12 time put in that had to be put in for the notes.

13 Q In TruCare, that system, when you were documenting stuff?

14 A Correct.

15 Q And you took time off during your employment with Centene;
16 correct, like vacation holiday?

17 A I did.

18 Q Okay. And I'll pull up your records again, your time
19 records, and you see that, and I'm going to filter, which is
20 how I use consort, by the type of time off. Holiday and
21 vacation so I'll sort by holiday and vacation, so here there is
22 one, two, three, four, five, six, seven, eight, nine, ten,
23 eleven days that you took holiday or vacation time. Does that
24 sound about right, on these days?

25 A I guess.

1 Q Okay. And you weren't working overtime in the weeks where
2 you had vacation or holiday; correct?

3 A I don't -- I have no clue.

4 Q Okay. And when you were late the forty-nine times -- I
5 know you said you weren't late forty-nine times, but when you
6 were late to work, what were you doing, why were you late?

7 A I don't know if it was because of the traffic or exactly
8 what it was.

9 Q Okay. And we talked about the record of your activities
10 -- hold on a second -- the record of your activities that you
11 logged. You said sometimes it was after you visited a member
12 or was after you visited a member, you were documenting a
13 conversation; correct?

14 A Correct.

15 Q And you must document every contact in the TruCare System;
16 correct?

17 A Yes.

18 Q And did you document everything that you did?

19 A Yes.

20 Q Okay. So every conversation you had with a member, every
21 visit you had with a member, you documented in the TruCare
22 System?

23 A Yes.

24 Q And so would your TruCare record activities show all the
25 contacts that you ever had with members?

1 member with Arkansas Total Care name. I don't know what they
2 put in the file but that was not discussed at the meeting.

3 They refused to give me a termination letter. They refused to
4 give Unemployment a termination letter.

5 Q Okay. Did you ever say anything during that meeting about
6 your pay?

7 A No.

8 Q Okay.

9 MS. STORCH: I'm going to take a quick
10 break if you don't mind.

11 WITNESS: Okay.

12 MS. STORCH: Okay. Like, what, ten
13 minutes. Is that okay?

14 WITNESS: Yes.

15 BREAK FROM 1:32 P.M. TIL 1:46 P.M.

16 BY MS. STORCH

17 Q Hello, Ms. King-Macon, again. I think we're almost
18 finished. So we were talking about your termination when we
19 took a break, and when your employment ended, do you believe
20 that you were owed any money?

21 A As I believe, while I was there, yes.

22 Q Okay. How much?

23 A I can't give a dollar figure.

24 Q Okay. Can you estimate how many hours you think you were
25 owed for?

1 A No. I can't.

2 Q Can you approximate?

3 A No.

4 Q Okay. Two hours, would that be a fair estimate?

5 A No. That wouldn't.

6 Q Okay. So you don't know the number of hours that you
7 think you're --

8 A No. I spent nights at the hospital with my members.

9 Q Okay. But you didn't record any of that time; correct?

10 A No.

11 Q And nobody knew about it?

12 A No.

13 Q Okay. So how did you learn about the litigation against
14 Centene?

15 A I overheard.

16 Q From whom?

17 A Mr. Dickerson.

18 Q Okay. Did you talk to Mr. Dickerson about the litigation?

19 A We were in the store.

20 Q Where?

21 A In the grocery store.

22 Q Do you know Mr. Dickerson outside of work?

23 A No. We were in the grocery store and I saw him.

24 Q How long after your employment with Centene ended?

25 A I don't even know.

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1 Q Did you learn about the litigation prior to the time where
2 you signed an engagement agreement with your attorney?

3 A Did I learn after?

4 Q Did you learn before. Well did you learn about the
5 litigation prior to the point where you signed the engagement
6 agreement?

7 A I learned about it -- are you saying before -- I mean, I'm
8 not understanding what you're saying.

9 Q The lawsuit that has been filed, you learned about it from
10 Mr. Dickerson. Had he already filed the lawsuit?

11 A I don't know.

12 Q Okay. Have you seen the video on your attorney's website?

13 A No.

14 Q Okay. So our understanding is that you're claiming that
15 you reported hours outside of your schedule for which you were
16 not paid. Is that your only claim in this lawsuit?

17 A Yes.

18 Q Okay. Have we discussed all the hours you worked for
19 which you were not paid?

20 A Yes.

21 Q Okay. And you said you don't know how many hours that is?

22 A No. I don't.

23 Q Okay. Can you give me a time-frame? You said it wasn't
24 in the first couple of months you worked; is that correct, when
25 you were getting ramped up in March and April?

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1 A That's correct.

2 Q So nothing in March and April?

3 A No.

4 Q Okay. Anything in May or you were still getting ramped
5 up?

6 A I mean, I can't tell you that. I don't know what months
7 it was but I can tell you that I spent several hours and I
8 don't know exactly how many.

9 Q Several hours.

10 A Yes.

11 Q Several hours, okay.

12 A I didn't write them down. If I had, you know, it would be
13 different but I did not write them down.

14 Q So ten or less?

15 A I cannot tell you that. I don't know. As I stated, I
16 have spent -- I've had a mother call me and said her daughter
17 will not cooperate at Children's, on several occasions, and
18 she's asking for Ms. Kim, and Ms. Kim got up out of her bed and
19 went to Children's. Care Coordinator, to me, that's part of my
20 job.

21 Q Okay.

22 A And I've also had to put in notes, on several occasions,
23 after my visits. So, I mean, I can't give you a number.

24 Q Okay. I'm going to show you an exhibit which is going to
25 be Exhibit 25. I'm sharing my screen. This is your

Kim King-Macon - December 9, 2022

REPORTER'S CERTIFICATE

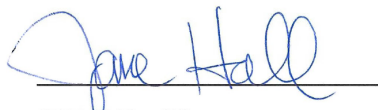
STATE OF ARKANSAS)

COUNTY OF PULASKI)

I, JANE HALL, Certified Court Reporter and Notary Public, do hereby certify that the facts stated by me in the caption on the foregoing proceedings are true; and that the foregoing proceedings were recorded verbatim through the use of the Stenomask, and thereafter transcribed by me to the best of my ability, taken at the time and place set out on the caption hereto via Zoom Teleconference.

I FURTHER CERTIFY that I am neither counsel for, related to, nor employed by any of the parties to the action in which these proceedings were taken; and further, that I am not a relative or employee of any attorney or counsel employed by the parties hereto, nor financially interested, or otherwise, in the outcome of this action.

WITNESS my hand and seal as such Official Court Reporter on this the 9th day of December, 2022.



JANE HALL, CCR

CERTIFICATE NUMBER 735

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